

Mark Carman - May 15, 2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

MARK CARMAN, Individually )  
and on behalf of All )  
Others Similarly Situated, )  
                                )  
                                Plaintiff(s), )  
                                )  
                                )  
V.                               ) NO. 2:22-cv-00313  
                                )  
                                )  
PORTSMOUTH REDEVELOPMENT )  
AND HOUSING AUTHORITY, )  
                                )  
                                Defendant. )

DEPOSITION UPON ORAL EXAMINATION OF

MARK L. CARMAN

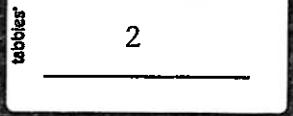
TAKEN ON BEHALF OF THE DEFENDANT

Portsmouth, Virginia

Monday, May 15, 2023

EXHIBIT

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1 Q Okay.

2 A No, I don't think I told him I did.

3 I think he found out through a letter from the law  
4 firm.

5 Q Okay.

6 A I don't think I talked -- because I  
7 didn't talk to him the entire time I was in the  
8 Philippines.

9 Q Okay. When was the first time that  
10 you provided services for the Authority, do you  
11 remember?

12 A I want to say June of 2021.

13 Q And how -- go ahead.

14 A Or July. It was either June or  
15 July, I'm not sure.

16 Q Okay. And how did you come in  
17 contact with the Authority such that you engaged  
18 in this relationship?

19 A They ran an advertisement on  
20 Indeed.

21 Q Okay.

22 A Posted it as an hourly wage  
23 position. I responded. I was interviewed.

24 Q Do you remember with whom you  
25 interviewed?

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1 A Keyond Gorley.

2 Q Okay.

3 A And then a second interview with  
4 Mr. Bland, and others were in the room.

5 Q Okay. And how was the offer to  
6 provide services to the Authority made to you?

7 A You mean in writing or verbal?

8 Q Right, correct.

9 A It was verbal.

10 Q Okay. And do you recall what that  
11 offer was?

12 A It initially was \$19 per hour.

13 Q Okay.

14 A And then it, I want to say within a  
15 week or two, it was \$20 an hour, and then it went  
16 to \$22 an hour.

17 Q Okay. Did you actually start  
18 working at 19 or --

19 A Yes, ma'am.

20 Q Okay.

21 A I believe my first paycheck was at  
22 19. I think so.

23 Q Okay.

24 A All right. So over a short period  
25 of time it increased to \$22 per hour?

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1 A Yes.

2 Q And was that the amount per hour  
3 that you agreed to be paid?

4 A Yes.

5 Q Until the end of your services?

6 A Yes.

7 Q Okay. When you worked by the hour.

8 A Right.

9 Q Okay. Did they have other security  
10 guard officers providing the same services when  
11 you first engaged with them?

12 A No.

13 Q So you were the first security  
14 guard officer providing security for them?

15 A No, but with a qualification.

16 Q Okay.

17 A There was a captain from the  
18 Sheriff's Department that had been dismissed from  
19 the Sheriff's Department and he was working there,  
20 and I'm told they were paying him and -- through  
21 the -- I was told when I went to work there he was  
22 getting paid as an off-duty police officer,  
23 because they were getting paid much more per hour  
24 than we were.

25 Q Okay. And that brings me to your

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1 A I did.

2 Q Okay. Mr. Carman, is it fair to  
3 say that you were paid directly by the Authority  
4 every two weeks? Do you recall that?

5 A On the normal payroll cycle, yes.

6 Q Okay.

7 A That would be every two weeks.

8 Q Okay. And tell me how you  
9 submitted time to the Authority so that you could  
10 get paid for your hours worked.

11 A We were required to complete a  
12 timecard showing the hours worked.

13 Q Okay. Tell me what that timecard  
14 looked like.

15 A And they provided it to you?

16 A Keyond Gorley gave us an Excel  
17 sheet for us to write in our time, and we did  
18 that. And I just went ahead and typed it up  
19 because it was easier for me to keep records of it  
20 for myself to save what I turned in.

21 Q Okay.

22 A And then we would give those to  
23 Keyond Gorley.

24 Q Okay. So when you said an Excel  
25 sheet, was it a printout or like --

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1 A Yes.

2 Q Okay.

3 A With the grids.

4 Q Okay.

5 A And it said hours, you know, time  
6 in, time out, hours worked; yes.

7 Q Okay. But you decided to type it  
8 up yourself for recordkeeping purposes and so  
9 could you read it and turn it in?

10 A Yes.

11 Q Okay. Did they dispute --

12 A I gave it to Keyond for him to  
13 approve it.

14 Q Okay.

15 A I turned it into an Excel form  
16 because I said, This looks sloppy, so...

17 Q Okay. So did they dispute with you  
18 how you turned it in?

19 They just wanted some recording of  
20 your hours worked, right, and your time in and  
21 time out?

22 A I never heard any dispute about it.

23 Q Okay. And did you submit all your  
24 hours worked when you provided services to the  
25 Authority the whole time you provided services?

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1 A Not after I went on salary.

2 Q Okay. So before you went on  
3 salary, did you submit to them all the time that  
4 you worked?

5 A Yes.

6 Q And did you get paid either 19, 20  
7 or \$22 an hour for all that time?

8 A Straight time, yes.

9 Q Straight time.

10 A Yes.

11 Q So you got all your straight time.

12 A I had no question with my pay --

13 Q Okay.

14 A -- on that regard.

15 Q Okay.

16 A And I will say this. If there ever  
17 was a discrepancy with myself or the other people,  
18 it was a matter of addressing it, and it -- and  
19 getting paid what was due was never a problem in  
20 that regard.

21 Q Okay. And when you got the payment  
22 from the Housing Authority, you noticed, correct,  
23 that there were no payroll taxes or anything  
24 deducted therefrom; right?

25 A Yes.

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1 A I do.

2 (Offer of Employment, two pages  
3 marked as Carman Exhibit Number 3)

4 BY MS. NORTH:

5 Q Okay. Is that your signature on  
6 the second page?

7 A Yes.

8 Q And it says that the Portsmouth  
9 Redevelopment and Housing Authority is pleased to  
10 extend you an offer of employment for the position  
11 of security program and risk management officer at  
12 an annual salary of \$48,620; is that right?

13 A That is.

14 Q So does this refresh your  
15 recollection on when you became full time employed  
16 as a W-2 employee with the Authority?

17 A It does.

18 Q Okay. And before this time, tell  
19 me in what capacity you were working as far as  
20 full time, part time, and what you were doing  
21 before this, right before this time.

22 A From August until this date --

23 Q Okay.

24 A -- I was working full time.

25 Q Okay. And what were you doing for

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1           Q       Did you take over that position, is  
2 that --

3           A       Kind of like he did when Keyond  
4 Gorley left. I was the senior guy there, so it  
5 was left up to me.

6           Q       Okay. So when you were hired as an  
7 employee in February -- on February 22nd, 2022,  
8 you knew that was an employee, full time, and you  
9 got your benefits and a guaranteed salary; right?

10          A       I knew it was and I knew how it got  
11 there is because I had been telling him,  
12 Mr. Bland, You promised to put me full time in  
13 September, and you haven't done it, and I either  
14 need a job or I'm going to go get one and I'm  
15 going to file a lawsuit on you.

16          Q       Okay. But you knew when you were  
17 hired in February of 2022 that you were hired to  
18 manage this department with a guaranteed salary  
19 and the benefits that came along with that as  
20 stated in this offer letter; right?

21          A       As stated in this offer letter,  
22 yes.

23          Q       Okay.

24          A       I was -- I knew that, but I was  
25 always -- the answer is yes.

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1 Q I understood that you were  
2 complaining about it beforehand, but I'm just  
3 trying to establish when you were hired --

4 A I understand. The timing is this  
5 day.

6 Q Okay. And I want to get an  
7 understanding from you of what your job was.

8 You were to take over and to manage  
9 the department and manage the other security  
10 guards; right?

11 A By this letter.

12 Q Yes.

13 A By -- I will say this. My  
14 testimony will be that I signed this under duress.  
15 I signed this because it says on the back that I  
16 had until 5 o'clock to do it --

17 Q Okay.

18 A -- and I wouldn't have a job if I  
19 didn't do it, if I didn't accept this. And I  
20 complained about it, I argued about it, but I  
21 needed to have a job.

22 Q Okay.

23 A So, yes.

24 Q So you just said you had bugged  
25 Mr. Bland about doing this, and he gave it to you.

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1                   So why were you signing under  
2 duress if it's what you wanted?

3                   A         Because it wasn't near the amount  
4 that I was supposed to get. It was -- it was  
5 nothing. And, plus, he told me that this  
6 (indicating) didn't mean anything; just to keep  
7 doing what I was doing. That's what he told me.

8                   Q         Okay.

9                   A         He said, This job description, you  
10 don't need to do all that insurance stuff, you  
11 don't do any of that stuff. You just go keep  
12 doing what you are doing.

13                  Q         Okay. So we will talk about what  
14 you did then instead of the job description.

15                  But just to be complete, if you  
16 look at what we've entered as Exhibit Number 4, it  
17 does say this was a job description for the  
18 security program -- programs manager, which you  
19 were given when you were offered this full-time  
20 job in February 2022; right?

21                  A         Yes.

22                  (Classification Description, four  
23                            pages marked as Carman Exhibit  
24                           Number 4)

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1           A       That was way early on.

2           Q       All my questions right now are  
3 after you signed the February 22nd, 2022 letter  
4 where you became the manager of this department.  
5 You didn't have to hire anyone because you had the  
6 staff already in place, you're saying; right?

7           A       Correct.

8           Q       Okay. And did you have the  
9 authority to recommend someone be disciplined or  
10 terminated if they messed up who was on your team?

11          A       It was made specifically clear to  
12 me by Ed Bland I didn't have any authority to do  
13 anything. He gave me that to shut me up  
14 (indicating).

15          Q       Okay. So the whole time that you  
16 managed the team of people providing security  
17 services to the Authority, you're saying you  
18 didn't feel like you had the authority to go to  
19 him and say, So-and-so messed up. We need to  
20 write him up or terminate her.

21          A       Ma'am, as of the date of this, I  
22 got an email that said I'm no longer to have any  
23 contact with Ed Bland and I have to do everything  
24 through Valerie Jenkins.

25          Q       Okay. When was that?

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1           A       Like the next day or so.

2           Q       Okay.

3                   All right. So, technically, you  
4 reported to Valerie Jenkins after you signed that  
5 document, Exhibit Number 3?

6           A       Yes.

7           Q       Okay.

8                   All right. Did you make the team  
9 schedules after the February 22, '22 letter, 2022  
10 letter?

11          A       Those schedules were submitted as a  
12 recommendation to Valerie Jenkins, and she  
13 approved it.

14          Q       Okay. Did you communicate with the  
15 team members on your team about the schedules and  
16 where -- what to patrol, what properties to patrol  
17 and, et cetera?

18          A       Yes.

19          Q       Okay. Did the team members submit  
20 any of the daily reports to you at the end of the  
21 shift or end of the day?

22          A       They all reported to me at the end  
23 of the shift and the end of the day.

24          Q       Okay.

25          A       Yes.

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1 Q Okay. And then did you submit  
2 whatever you submitted to higher level management  
3 to Valerie Jenkins?

4 A Yes.

5 Q Okay. Did you have to request that  
6 anybody on your team be disciplined for any  
7 wrongdoing or misconduct?

8 A No.

9 Q Okay. Did you recommend that any  
10 of them receive any kind of pay raise during the  
11 time you managed them?

12 A No.

13 Q Did you have the authority to  
14 recommend to Valerie that you thought someone  
15 needed a pay raise?

16 A No.

17 Q So Valerie would just determine for  
18 herself without any input from you if someone  
19 needed a raise?

20 A It never came up. I wouldn't have  
21 any idea.

22 Q Okay. Did you go through the  
23 Portsmouth Authority's orientation for new hires  
24 when you -- after you signed this letter?

25 A Yes.

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1 Q Okay. And do you remember what  
2 that consisted of, what type of training that was?

3 A Handed me a booklet and said, Read  
4 this, sign here.

5 Q Okay. Employee handbook?

6 A Um-hum.

7 Q And did you do that?

8 A Yes.

9 Q Okay. Did they tell you you don't  
10 need to record any hours at all for yourself?

11 A No. They told me that I had to  
12 turn in 40 hours. I asked the question, So then  
13 what happens if I get called out at it 2 o'clock  
14 in the morning because there's a shooting?

15 Just turn in 40 hours.

16 Q And how many people were on your  
17 team after February 22nd?

18 A Myself plus three.

19 Q And who were the three?

20 A Tenisha Stithe --

21 Q Okay.

22 A -- Kevin Perry and Nathaniel  
23 Jackson.

24 Q Was it the three of them until you  
25 resigned?

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1 Q Okay.

2 A Maybe I'd been through enough and I  
3 was just defeated.

4 Q Here is the next exhibit.

5 (2/24/22 email from Carman to  
6 Bland, one page marked as Carman  
7 Exhibit Number 5)

8 BY MS. NORTH:

9 Q What we've entered as Exhibit 5 is  
10 an email from you to Mr. Bland; right?

11 A Yes.

12 Q And Edward Bland is the executive  
13 director of the Authority; correct?

14 A Yes.

15 Q Okay. And it says as of  
16 February 24th 2022, you were confirming in an  
17 email some of the directives he had given you  
18 about the use of force and carrying weapons in  
19 your department; right?

20 A That's correct.

21 Q Some things were changing; is that  
22 right?

23 A Yes.

24 Q Okay. And so was it up to you to  
25 go back to your team members, Tenisha, Kevin, and

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1 Nathan, and make sure they understood these  
2 changes?

3 A Yes.

4 Q Okay. And were you to serve as the  
5 compliance officer overseeing the accurate  
6 documentation regarding all training and licensing  
7 for the department?

8 A I've never been certified as a  
9 compliance officer.

10 Q I don't -- I'm not talking about  
11 any kind of official certification.

12 Were you designated like you said  
13 here to serve as the compliance officer for the  
14 Authority about overseeing training and licensing?

15 A That's what I had in mind at this  
16 time.

17 Q Okay. Let me show you these last  
18 documents.

19 There you go.

20 Mr. Carman, what we've entered as  
21 Exhibit Number 6 is an email. At the bottom you  
22 will see it's from you to Edward Bland with some  
23 other individuals copied who are at the Authority;  
24 right?

25 A Yes.

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1 (2/24/22 emails re: Reduction in  
2 security availability and  
3 capability, two pages marked as  
4 Carman Exhibit Number 6)

5 BY MS. NORTH:

6 Q And, again, it was to document and  
7 implement some directives about reducing security  
8 staff hours, not having weekend patrols, and that  
9 the -- the fact that some -- some folks would be  
10 unarmed; is that right?

11 A Whatever it says on the paper, yes.

12 Q Okay. And were you responsible for  
13 making sure that the staff didn't work any more  
14 hours than what was directed to you?

**15**                   **A**                   **NO.**

16 Q Who made sure that the hours  
17 weren't exceeded?

18 A Valerie Jenkins -- or Valencia  
19 Jenkins.

20                      ○                      Okay.

21 A I keep calling her Valerie Jenkins.  
22 It's Valencia.

23                      ○                      Okay.

24 A It's -- "Val" is what we always  
25 called her.

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1           A        Absolutely none.

2           Q        Okay. And let me see here.

3                     This is what I need next. This is  
4 your resignation. I forgot to put a sticker on  
5 it. Forgive me.

6                     Do you recognize that, Mr. Carman?

7           A        I do.

8           Q        Okay. What we've entered as  
9 Exhibit Number 9 is your resignation; is that  
10 right?

11          A        Yes.

12          Q        And it's dated May 3rd, 2022?

13          A        Yes.

14                     (5/3/22 email re: My resignation,  
15                     two pages marked as Carman Exhibit  
16                     Number 9)

17          BY MS. NORTH:

18          Q        Did you depart on May 3rd, 2022,  
19          that same day?

20          A        I'm pretty sure I did.

21          Q        I just didn't know if you recalled  
22          giving any kind of notice.

23          A        No.

24          Q        All right. And so you told the  
25          Authority that you were resigning and that you

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1 know other than -- what I understand is that this  
2 action is exclusive for unpaid overtime wages.

3 Q Okay. I appreciate that.

4 Let me hand you the last exhibit.

5 A Okay.

6 Q It's your pay.

7 And do I have that right? Is that  
8 10?

9 A Yeah, this is 10.

10 (Pay Detail, 45 pages marked as  
11 Carman Exhibit Number 10)

12 BY MS. NORTH:

13 Q Take a look at that packet,  
14 Mr. Carman, and I need you to clarify whether  
15 that's all the hours you submitted and this is all  
16 the pay that you received from the Authority.

17 A Do you want me to go through every  
18 single one of these?

19 Q Yes, sir. Hopefully it's the not  
20 the first time you've been seeing some of this  
21 stuff, so...

22 A Well, it is. It will take awhile.

23 Q Take your time.

24 A May I ask a couple qualifying  
25 questions to kind of short-shoot through this?

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1 Q Sure.

2 And let me direct your attention to  
3 the first thing right here.

4 If you look on the second page,  
5 Number 2, is that something you all would submit,  
6 your team, to the Portsmouth Authority?

7 A Yes.

8 Q It has hours.

9 So if you look -- that's why I was  
10 hoping you can see your name and you can see the  
11 dates you worked and the hours you worked and the  
12 rate.

13 A Um-hum.

14 Q So can you verify that?

15 A This appears to be correct.

16 Q Okay.

17 A As far as the total and all that, I  
18 would have to go here line by line and go based  
19 off the emails and stuff where I emailed these in  
20 and kept my own records, but I'm pretty sure,  
21 because some of these documents -- this one here,  
22 this is signed by Marc Gonzalez.

23 Q Sometimes they have both your names  
24 on it --

25 A Yeah.

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1 Q -- because it's both of you.

2 So it's just for you to verify on  
3 behalf of yourself, not on behalf of anybody else.

4 A I'm going to do this. I'm going to  
5 say it this way. Based upon my experience in  
6 accounting with the PRHA, I'm going to assume this  
7 is a thorough document and I'm going -- my  
8 testimony -- my answer will be that, qualified  
9 with this. If all of the pay sheets are here,  
10 this would be an accurate assessment --

11 Q Correct. Okay, I appreciate that.

12 A -- instead of going through line by  
13 line.

14 Q I understand that.

15 All right. And if you could look  
16 at that, this is for the time that you worked  
17 before you became an employee in February of 2022.

18 If you look at this, it takes you  
19 through the end of 2021.

20 A Yes.

21 Q Okay. And so, again, if you turn  
22 to the second page of Exhibit 10 and you see your  
23 name and the date worked and the hours worked and  
24 the hours and the rate, of course you submitted  
25 those hours; right? On behalf of yourself.

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1                   Do you see where it says Mark  
2 Carman?

3                   A       Yes, I submitted those to the  
4 supervisor.

5                   Q       Okay. So whenever we see this type  
6 of document in your packet related to you and your  
7 hours, you are testifying that those are accurate  
8 hours that you worked during that time?

9                   A       Not being able to dispute it and  
10 knowing the accounting of my previous  
11 experience --

12                  Q       Yes, sir.

13                  A       -- I'm going to stipulate that is  
14 accurate.

15                  Q       Okay. Thank you.

16                  A       I believe that to be accurate.

17                  Q       Okay. So I lied a little bit. I  
18 thought that was the last exhibit, but this is  
19 actually the last exhibit.

20                  A       I don't want to have to say in  
21 front of this court reporter that I need to use  
22 the bathroom.

23                  Q       Let's go ahead and take a break.

24                  A       If you just got one more  
25 document...

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1 Q Let's -- it's certainly fine for  
2 you to take a break.

3                   A           I didn't want that in the record,  
4                   but...

5                            It's okay.

6 A I know.

7 Q Here you go. Take a look at that  
8 for me, Mr. Carman. I would submit that this is  
9 your pay for the time that you were an employee  
10 and being paid a salary.

11 A Okay.

12 (Pay Summary, seven pages marked  
13 as Carman Exhibit Number 11)

14 BY MS. NORTH:

15 Q So you just look at that and let me  
16 know --

17                   A               Yes, I'll stipulate this is  
18 accurate because I never seen -- I have never seen  
19 these type sheets.

20 Q Okay. But I just want you to look  
21 at the information on it.

22 Your salary, according to the  
23 payroll, was 1870 biweekly based on the salary in  
24 your employment letter; right?

25 A I believe that would be accurate.

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1       worked?

2           A       I am asserting that, yes.

3           Q       Okay. So we need to go through and  
4       from February 22nd of 2022 through May 3rd, I need  
5       to know how many hours per week you're saying you  
6       worked.

7           A       I -- it would be mere speculation  
8       because it really was around-the-clock. It would  
9       be work a normal 40-hour week; okay? That normal  
10      40-hour week would be arrive at about 8:30 --

11       Q       Okay.

12       A       -- and then I would work about four  
13      to six hours, then come back because most of our  
14      work would be in the evening hours.

15       Q       Okay.

16       A       Now, there were times when I would  
17      get called out first thing in the morning because  
18      there's somebody sleeping in one of the foyers in  
19      one of the apartment-type houses.

20       Q       Okay.

21       A       So I would respond to that.

22                 If there's a shooting. If there's  
23      a fire. If there is some sort of a serious-nature  
24      thing, the police were told to notify me. So I  
25      would get a call from 911 dispatch to respond.

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1                   So I don't have any way of  
2 calculating it.

3                   I can say that a typical week would  
4 be -- it seemed like I worked all the time,  
5 because sometimes I did.

6                   But a typical week would -- after  
7 they cut it back to the 33 hours piece for those  
8 guys, I was probably working 60 hours a week,  
9 roughly.

10                  Q         Okay. I need you to try to do your  
11 best to be as specific as possible because you're  
12 claiming unpaid money for it.

13                  A         Yeah. And I don't have any way to  
14 back it up because I didn't keep those records. I  
15 was told to turn it in. So it's mere speculation  
16 on my part. So if I can't prove that, I can't  
17 prove it, but I'm just going based on what I can  
18 recall.

19                  Q         Okay. And you think you were --  
20 you think you worked 60 hours per week?

21                  A         And I'm -- I'm going to say that  
22 that was -- that that's probably conservative.

23                           Let me do it this way. I would  
24 work a shift with them almost every day. Then I  
25 would work four, maybe six, seven hours before

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1 Q You said they were directed to call  
2 you, so...

3 A No, no, no. I think we're talking  
4 about two different things.

5 Q Okay.

6 A The 911 dispatch, the police  
7 dispatch or fire dispatch would call my house.

8 Q Yeah.

9 A I also had a radio that  
10 communicated with the police --

11 Q Okay.

12 A -- and the fire. So I had police  
13 and fire channels.

14 Q All right.

15 A So I would get calls to respond.

16 Q Okay.

17 A Now, as far as the employees, yes,  
18 we'll go back to our previous conversation -- the  
19 previous question -- where if they got in a  
20 situation where they ran up on something, hadn't  
21 been reported to 911 -- I seem to recall that they  
22 rolled up on a stabbing where a woman was  
23 murdered, and they got there before 911 got it,  
24 I'm pretty sure, because they saw it on normal  
25 patrol and I was heading that way when I got the

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1 call.

2 Q When you got the call.

3 A So, yes, they would let me know --

4 Q Okay.

5 A -- as I would have let them know,  
6 and I always did let them know when 911 called me,  
7 Hey, you need to roll this direction.

8 Q Okay. I'm trying to clarify,  
9 though.

10 But 911, when the police or  
11 firehouse called you, it was because --

12 A I was the manager.

13 Q Right, okay.

14 A That is correct.

15 Q Okay.

16 Okay. And the -- to the best of  
17 your recollection, you're going to say you worked  
18 60 hours per week, because you're going to have to  
19 answer this.

20 A Yes.

21 Q It was due today. And so that's  
22 why I'm trying to press you on --

23 A I understand.

24 Q -- now is the time to do to the  
25 best of your recollection how many hours a week